

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
)	
v.)	Cr. No. 04-10319-WGY
)	
NOEL HERNANDEZ)	
)	

GOVERNMENT'S MOTION FOR EXTENSION OF TIME

The United States, through the undersigned attorney, respectfully requests that the date for the government to file a response pursuant to Local Rule 7.1 to Defendant Noel Hernandez's Motion to Suppress In-Court and Out-of-Court Identifications, dated March 2, 2005,¹ be extended up to and including April 4, 2005.

As grounds for this motion, the government states that it needs additional time to respond to the defendant's motion. The undersigned prosecutor presently is involved in several complex, ongoing investigations and cases. Consequently, the government seeks additional time to meaningfully address the law and the facts pertaining to this motion. I have spoken to counsel for the defendant, Peter C. Horstmann, who indicates that he does not

¹On March 3, 2005, this Court allowed the Defendant's Motion for Leave to File Motion to Suppress In-Court and Out-of-Court Identifications Late. The Court has set the date of the hearing on the suppression motion for April 27, 2005.

object to the extension of time.

WHEREFORE, the United States respectfully requests an extension of time for the government to file a response to Noel Hernandez's Motion to Suppress In-Court and Out-of-Court Identifications, up to and including April 4, 2005.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/William F. Bloomer
WILLIAM F. BLOOMER
Assistant U.S. Attorney

CERTIFICATION

I hereby certify that I have conferred with defense counsel, Peter C. Horstmann, prior to filing the instant motion pursuant to Local Rule 7.1(2).

/s/William F. Bloomer
WILLIAM F. BLOOMER
Assistant U.S. Attorney